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ACCESS GENERAL INSURANCE AGENCY
OF CALIFORNIA, LLC; ACCESS CORPORATE
SERVICES, LLC; and ACCESS HOLDCO
MANAGEMENT, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RUTH GAMBOA,

Plaintiff,

vs.

ACCESS GENERAL INSURANCE
AGENCY OF CALIFORNIA, LLC;
ACCESS CORPORATE SERVICES,
LLC; ACCESS HOLDCO
MANAGEMENT, LLC; and DOES 1
through 50, inclusive,

Defendants.

Case No: CV17-04316 RGK(JCx)

[Assigned to the Honorable R. Gary
Klausner]

**ORDER GRANTING
STIPULATED PROTECTIVE
ORDER AS MODIFIED**

COMPLAINT FILED: February 22,
2017

TRIAL DATE: April 24, 2018

1 The parties have submitted a Stipulated Protective Order, Docket Entry No. 31
2 (“Stipulation”), seeking an Order protecting confidential, proprietary or private information
3 produced or exchanged in discovery.

4 The Court, having reviewed the Stipulation, and good cause appearing, hereby
5 GRANTS the Stipulation with the following modifications:

6 1. Paragraph 3, entitled “SCOPE” is modified to read as follows:

7 The protections conferred by this Stipulation and Order cover not only Protected
8 Material (as defined above), but also (1) any information copied or extracted from Protected
9 Material; (2) all copies, excerpts, summaries, or compilations of Protected Material; and
10 (3) any deposition testimony, conversations, or presentations by Parties or their Counsel that
11 might reveal Protected Material, other than during a court hearing or at trial. However, the
12 protections conferred by this Stipulation and Order do not cover the following information:

13 (a) any information that is in the public domain at the time of disclosure to a Receiving Party
14 or becomes part of the public domain after its disclosure to a Receiving Party as a result of
15 publication not involving a violation of this Order, including becoming part of the public
16 record through trial or otherwise; and (b) any information known to the Receiving Party
17 prior to the disclosure or obtained by the Receiving Party after the disclosure from a source
18 who obtained the information lawfully and under no obligation of confidentiality to the
19 Designating Party. Any use of Protected Material during a court hearing or at trial shall be
20 governed by the orders of the presiding judge. This Order does not govern the use of
21 Protected Material during a court hearing or at trial.

22 2. In the fifth line of text in Paragraph 4, the word “trail” is changed to “trial”.

23 3. In the fourth line of the last (unnumbered) subparagraph of Paragraph 8, the
24 following is added after “Designating Party’s permission”: “or unless otherwise required
25 by the law or court order.”

26 4. Paragraph 9(c) is modified to read as follows:

27 If a Non-Party represented by counsel fails to commence the process called for by
28 Local Rules 45-1 and 37-1, et seq. within 14 days of receiving the notice and accompanying

1 information or fails contemporaneously to notify the Receiving Party that it has done so, the
2 Receiving Party may produce the Non-Party's confidential information responsive to the
3 discovery request. If an unrepresented Non-Party fails to seek a protective order from this
4 court within 14 days of receiving the notice and accompanying information, the Receiving
5 Party may produce the Non-Party's confidential information responsive to the discovery
6 request. If the Non-Party timely seeks a protective order, the Receiving Party shall not
7 produce any information in its possession or control that is subject to the confidentiality
8 agreement with the Non-Party before a determination by the court unless otherwise required
9 by the law or court order. Absent a court order to the contrary, the Non-Party shall bear the
10 burden and expense of seeking protection in this court of its Protected Material.

11 IT IS SO ORDERED.

12 DATED: November 20, 2017

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14 /s/

15 Honorable Jacqueline Chooljian
16 UNITED STATES MAGISTRATE JUDGE
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